

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

VOLTERRA SEMICONDUCTOR  
LLC,

Plaintiff,

v.

MONOLITHIC POWER SYSTEMS,  
INC.,

Defendant.

**PUBLIC VERSION**

C.A. No. 19-2240-CFC-SRF

**PLAINTIFF'S CONCISE STATEMENT OF FACTS IN OPPOSITION TO  
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT (NO. 1)**

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Dated: December 17, 2021

*Counsel for Plaintiff Volterra  
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**I. Volterra's Response to MPS's Statement of Facts**

1. Admitted.<sup>1</sup>
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.

**II. Volterra's Responsive Statement of Facts**

7. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Ex.

1, MAXIM\_00011579.

8. [REDACTED]

[REDACTED]

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<sup>1</sup> While Volterra admits certain paragraphs of MPS's SOF (D.I. 277), Volterra disputes that those facts support summary judgment because the other facts detailed in this statement demonstrate a genuine dispute of material fact to be litigated and show facts from which a jury could find in Volterra's favor.

[REDACTED]

[REDACTED] *Id.*

9. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *Id.*

10. On August 4, 2021, MPS deposed Stan Bochenek, Volterra's 30(b)(6) witness regarding [REDACTED] Mr. Bochenek testified about Volterra's and [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *Id.* at 221:3-222:5.

11. On September 17, 2021, Volterra served its opening infringement report from its technical expert Dr. Dickens, who explained how [REDACTED]

[REDACTED]

[REDACTED] and/or the coupled inductors

included in MPS's Accused Instrumentalities and in so doing directly infringe" the

Asserted Patents. Ex. 3, Dickens Opening Report at ¶ 163 ('408 Patent); *see also*

*id.* at ¶ 110 ('986 Patent); ¶ 206 ('955 Patent). The report also explained how MPS induces this direct infringement. *See id.* at ¶¶ 481-490.

12. Dr. Dickens opined on how MPS induced [REDACTED] and its contractors to make and import into the United States the Nvidia Power Solution. Dr. Dickens explained how [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *Id.* at ¶

73 (citing NVIDIA\_0000412). Dr. Dickens explained how [REDACTED]

[REDACTED]

[REDACTED] *Id.* at ¶ 74 (citing Huang Depo at 228:1-230:23;

NVIDIA\_0000532).

13. Dr. Dickens opined on how MPS induced [REDACTED] and its coupled inductor manufacturers to make and import into the United States the coupled inductors included in the Nvidia Power Solution. Dr. Dickens explained how [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *Id.* at ¶ 65 (citing

MPS\_DE-00010257). Dr. Dickens further explained how [REDACTED]

*Id.* at ¶ 486

(citing NVIDIA\_0002231; MPS\_DE-00010205; MPS\_DE-00010257; MPS\_DE-00010283).

Dated: December 17, 2021

FISH &amp; RICHARDSON P.C.

By: /s/ Robert M. Oakes

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Semiconductor Inc.*

**CERTIFICATE OF COMPLIANCE**

The undersigned counsel hereby certifies that **Volterra's Concise Statement of Facts In Opposition to Monolithic Power Systems, Inc.'s Motion For Summary Judgment (No. 1) Based On** [REDACTED] contains 666 words (exclusive of the title, caption, tables, and signature block) prepared in Times New Roman 14-point font.

Dated: December 17, 2021

/s/ Robert M. Oakes  
Robert M. Oakes (#5217)